



SRO

STATE SCHOOL REFORM/REDESIGN OFFICE
Michigan Department of Technology, Management and Budget

Unreasonable Hardship Determination Report

International Academy at Hull

February 2017

DRAFT

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Framework

State School Reform/Redesign Office Background and Legal Authority

The State School Reform/Redesign Office (SRO) was established in 2010 to serve as Michigan's academic accountability office. The mission of the SRO is to turn Michigan's Priority Schools into the highest-performing schools in Michigan. The SRO's vision is to create the necessary conditions for a globally superior public education system. To do this, the SRO uses both incentives for academic success and consequences for chronic failure. The following state and federal statutes establish the SRO and govern the office's action steps:

Michigan's Revised School Code 380.1280c: Section 1280c of the Revised School Code charges the SRO with the responsibility of identifying and supervising the lowest achieving 5% of schools (Priority Schools). Priority Schools submit reform/redesign plans to improve performance, and the SRO is granted authority to implement intervention if academic progress is not made (i.e. CEO operator for multiple schools, State School Reform/Redesign District (SSRRD), etc.). Priority Schools are required to submit monitoring reports to the SRO in a manner and frequency as determined by the SRO. The statute also provides exemptions for districts under emergency management.

Michigan's Executive Order No. 2015-9: Executive Order 2015-9 transferred the SRO from the Michigan Department of Education (MDE) to the Department of Technology, Management, and Budget (DTMB). It also transferred all authority, powers, duties, functions, and responsibilities assigned to MDE and the Superintendent of Public Instruction under MCL 380.1280c to the SRO.

Michigan Public Act 192 (i.e. Enrolled House Bill 5384): The law divides the Detroit Public School District (DPS) into two separate districts and requires the SRO to mandate school closures via specified stipulations.

Under these statutes, the State School Reform/Redesign Office must make notifications and issue orders to Public School Academy Authorizers and/or Traditional Public School Superintendents/Board Presidents establishing different levels of accountability based on the performance of the schools they operate/authorize.

Purpose

On January 20, 2017, the SRO published the order subjecting [School] to a Next Level of Accountability pending an Unreasonable Hardship Determination as required under subsection 391(3), MCL 380.391(3). The purpose of this report is to:

- Outline the Unreasonable Hardship Review Process
- Detail the findings of the Unreasonable Hardship Review
- Publish the final Unreasonable Hardship Determination for **International Academy at Hull**, and
- Detail next steps that the SRO recommends in light of the final Unreasonable Hardship Determination.

Unreasonable Hardship Review Process

In accordance with MCL 380.391(3), the SRO must complete an analysis of whether closure of [International Academy at Hull] will result in unreasonable hardship to pupils attending [International Academy at Hull]. The SRO will consider other public school options available to students in the grade levels offered and geographic area served by the public school identified for closure to determine if closing the identified school(s) would result in an unreasonable hardship for the impacted students. The SRO is committed to ensuring that the closure of a failing school does not necessitate the enrollment of a displaced student in another failing school. The SRO's Unreasonable Hardship Review will consist of three parts:

1. **Part 1:** A comprehensive review of all available data related to the past and current performance of the identified school(s)
2. **Part 2:** An academic and an operational on-site review
3. **Part 3:** A detailed examination of other public school options available to students in the grade levels offered and geographic area served by the public school identified for closure.

A set of research-based Turnaround Practices served as the framework for the SRO's Unreasonable Hardship Review. The Turnaround Practices¹ are based on both academic and practice-based research on the common characteristics of successful turnaround schools and are organized into five different domains:

- **Domain 1:** Leadership, Shares Responsibility, and Professional Collaboration
- **Domain 2:** Intentional Practices for Improving Instruction
- **Domain 3:** Providing Student-Specific Supports and Instruction to All Students
- **Domain 4:** School Climate and Culture
- **Domain 5:** District System: Districts develop systems to support, monitor, and sustain turnaround efforts

By structuring the SRO's Unreasonable Hardship Review around these domains the SRO is acknowledging that in determining unreasonable hardship one must not only examine historic performance but must also work intimately with local community members and educators to determine if the academic and operational realities of the identified school reflective of a school poised for rapid turnaround.

All of the information produced and insights gained from the Unreasonable Hardship Review Process have informed the SRO's Final Unreasonable Hardship Determination, which consists of a series of 3 Key Questions:

- **Question 1:** Are the academic and operational realities of the identified school reflective of a school poised for rapid turnaround?
- **Question 2:** Are there are sufficient other public school options reasonably available to these pupils?
- **Question 3:** Would the proposed NLA action result in an unreasonable hardship to the displaced pupils?

¹ See Edmonds, 1979; Bryk et al., 2010; Marzano, 2003; Newmann et al., 2001; Lane et al., 2014)

Unreasonable Hardship Review Part 1: Data Review

In an effort to inform the Unreasonable Hardship Determination, the SRO requested a comprehensive set of both academic, cultural, and operational data from [International Academy at Hull]. The data provided can be viewed in Appendix A. In reviewing this data as well as previously state-reported academic data, the SRO has identified the following Key Takeaways related to the past, and current realities of [International Academy at Hull].

Data Review Key Takeaways

- **Academic (Domains 2 and 3)**
 - Proficiency
 - Between 2014 and 2016 the percent of proficiency demonstrated for all students in Mathematics decreased from [REDACTED]
 - Between 2014 and 2016 the percent of Hispanic students that demonstrated proficiency in Mathematics decreased from 13.04% to 6.9%
 - Between 2014 and 2016 the percent of students with disabilities that demonstrated proficiency in Mathematics grew from 9.09% to 13.33%
 - Between 2014 and 2016 the percent of proficiency demonstrated for all students in Reading/ELA dropped from 21.18% to 9.03%
 - Between 2014 and 2016 the percent of students with disabilities that demonstrated proficiency in Reading/ELA decreased from 23.81% to 7.28%
 - Between 2014 and 2016 the percent of Hispanic students that demonstrated proficiency in Reading/ELA decreased from 39.13% to 20%
 - Between 2014 and 2016 the percent of proficiency demonstrated for all students in Science increased from [REDACTED]
 - Between 2014 and 2016 the percent of Hispanic students that demonstrated proficiency in Reading/ELA increased from 7.69% to 8.33%
 - Between 2014 and 2015 the percent of students with disabilities that demonstrated proficiency in Science grew from 10% to 12.5%
 - Between 2014 and 2016 the percent of proficiency demonstrated for all students in Social Studies grew from [REDACTED]
 - Between 2014 and 2016 the percent of students with disabilities that demonstrated proficiency in Social Studies grew from [REDACTED]
 - Student Instructional Support Systems (Interventions)
 - Socio-Emotional Supports: Significant opportunities have been provided to teachers and administrators around improving their practices, improving the services to students, and building teacher and administrator leadership by: Serving children in light of trauma, poverty, and race and PBIS best practices.
 - Student discipline and attendance records will be reviewed, grade and NWEA growth measures will be analyzed each fall, winter, and spring with improvement plans developed by each building and grade PLCs who will then make instructional adjustments.
 - Results of a survey given twice a year to parents, students, and staff are evaluated by each building and improvement plans are developed as needed.
 - Academic Supports: Increased budgets for added resources for classroom materials to support instruction.

- For all students in grades 1-3, an additional 90 minute period for literacy was incorporated to the school day.
- Through a MDE grant for extended day, additional tutoring services are provided K-3. Added positions of Academic Support at K-5 in reading and math.
- For K-8 students, a Dual Language School of Choice was placed within the facility and is now serving 130 students in both Spanish and English instruction.
- With the restructuring of the building, new leadership teams were established. Teams are establishing effective meeting protocols
- Curriculum embedded assessments will be given every four to nine weeks by classroom teachers and results will be reviewed by PLCs who will then make instructional adjustments.
- PLC logs are kept to track the activity, data analysis, and decision making of PLC teams.
- Monthly walk-throughs at each building are carried out by central administration to look for evidence of implementation of curriculum, instructional practices, and student engagement.
- School Advance Administrator Evaluation model was adopted this year and administrators will be evaluated on three domains as well as student achievement and student achievement gains.
- The Thoughtful Classroom model was adopted for teacher evaluation this year and five domains will be implemented with all teaching staff as well as student engagement.
- Curriculum
 - ELA: Engage New York ELA (Core Knowledge)
 - Math: Engage New York Math (Eureka)
 - Science: Online resources; Atlas Rubicon
 - Social Studies: Embedded in Engage New York
- **Climate and Culture** (Domains 3 and 4)
 - Enrollment
 - Between 2014 and 2016, enrollment dropped from 517 to 386 (131 student difference)
 - Between 2014 and 2016 the number of economically disadvantaged students decreased from 464 to 338 (126 student difference).
 - Between 2014 and 2016 the percentage of economically disadvantaged students decreased from 89.7% to 87.6%.
 - African Americans consistently make up 74% to 82% or more of the student population.
 - Hispanic students consistently make up 13% to 20% or more of the student population.
 - Between 2014 and 2016 the greatest decline in student enrollment occurs in grade 4 from 89 to 43 students.
 - Sixth and seventh grade were the only grades to have an increase in student enrollment from █ to 23 students, respectively.
 - Attendance
 - Between 2014 and 2016 the attendance rate grew from 91.1% to 92.4%.
 - Between 2014 and 2016 the percentage of chronically absent students has decreased from 49.8% (270 students) to 44.3% (176 students).
- **Professional** (Domains 1 and 5)
 - Teacher Evaluation
 - Between 2014 and 2016 the number of teachers decreased by eighteen from 41 to 23.

- The number of teachers rated as highly effective was 4 (9.8%) in 2014 and 3 (13.0%) in 2016.
- The number of teachers rated as effective decreased from 33 (80.5%) to 14 (60.9%) in 2016.
- There were 6 teachers rated as marginally effective or ineffective in 2016.
- In 2016, 5 (21.7%) teachers were rated as marginally effective.
- In 2016, 1 (4.4%) teachers were rated as ineffective.

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Unreasonable Hardship Review Part 2a: Academic On-Site Review

On February 9, 2017, three representatives of the SRO conducted the Academic On-Site Review for **International Academy at Hull**. The purpose of this visit was to gain current and school-specific information related to the current academic realities of the school from its building leaders, teachers, parents and community members. The Academic On-Site Review was structured as follows:

- Interviews with Building Leadership
- Building Walk-Through with Classroom Observations
- Teacher Leader Focus Group
- Student Focus Group
- Parent/Community Focus Group

In a letter sent on January 23, 2017, the SRO requested that the school nominate both teacher leaders as well as parents and community members to participate in the Academic On-Site Review.

The review was structured around the research-based Turnaround Practices & questions that served to frame both the interviews as well as the focus group discussions. Responses from conversations were analyzed & evaluated for alignment with key indicators of best practices for high-gain, rapid turnaround schools. The following pages provide the results from the site visit. Rubric ratings (see below) and corresponding evidence (in bulleted form) is provided for each Turnaround Practice component.

Rubric Descriptors

<u>Strong alignment with best practice</u>	<u>Moderate alignment with best practice</u>	<u>Low alignment with best practice</u>
All indicators are evident and there is strong evidence that key structures and practices are being used effectively to improve instruction.	Some of the indicators are evident and there is some evidence that key structures and practices are being used effectively to improve instruction.	A few or none of the indicators are evident and/or there is little to no evidence that key structures and practices are being used effectively.

A key purpose of the site visit is to assess each school's capacity to engage in accelerated turnaround and to inform decisions regarding unreasonable hardship. As such, site reviewers and the SRO are focused on the following overarching questions.

<p>Domain 1: Leadership, Shares Responsibility, and Professional Collaboration</p> <ul style="list-style-type: none"> • Does the school have a collaborative environment (e.g., sufficient teaming structures and ways of working together) that can lead to accelerated instructional improvement? • Does the school leadership have systems in place to monitor and support the implementation of improvement strategies, including the use of frequent classroom observations? 	<p>Domain 2: Intentional Practices for Improving Instruction</p> <ul style="list-style-type: none"> • Does the school utilize a common core curriculum that is instructionally coherent and that displays a strong understanding of high quality instruction, among teachers and as supported and observed by administrators? • Does school leadership have a system in place to identify teachers that may need additional support, and specific strategies for providing such support?
<p>Domain 3: Providing Student-Specific Supports and Instruction to All Students</p> <ul style="list-style-type: none"> • Does the school have and actively utilize a system of assessments and interventions capable of providing student-specific supports and subsequent monitoring of the effectiveness of interventions? 	<p>Domain 4: School Climate and Culture</p> <ul style="list-style-type: none"> • Does the school provide a safe, orderly, and respectful environment for students and a collegial and professional culture among adults?

Determining Capacity for Successful Turnaround

Key Question 1: What are the core issues and challenges that have kept students at your school from achieving? How are you addressing these issues and challenges?

Key Question 2: What are the key practices and strategies that distinguish your school, and will allow your school to improve, leading to increased student achievement in the near future?

	Alignment with Best Practice
<p>Adaptive Instructional Improvement All stakeholders espouse an “improvement mindset” reflected in the school’s continuous review and assessment of improvement practices and strategies used within the school.</p> <p>Key Indicators</p> <ul style="list-style-type: none"> The school stops or modifies strategies that are not working and expands those that are working. 	
<p>Respectful and Trusting Learning Environment All stakeholders (students, teachers, community members, etc.) have high expectations for students and value working with and learning from each other.</p> <p>Key Indicators</p> <ul style="list-style-type: none"> Parents and students state that they believe that all of the students in the school will succeed (e.g., will do well in classes, graduate, attend and graduate college). Teachers and administrators work together in formal and informal teams on a regular basis. 	
<p>Instructional Rigor Instruction and instructional practices are engaging, differentiated, and sufficiently challenging for all students.</p> <p>Key Indicators</p> <ul style="list-style-type: none"> Teachers provide all students with lessons and instruction directly aligned with common core standards and aligned instructional practices. Written lessons and taught instruction includes stated and written learning objectives, multiple instructional strategies, and challenging (e.g., higher order) tasks, problems, and questioning strategies. 	
<p>Targeted Interventions The school expertly uses specific instructional strategies/interventions executed with a high degree of instructional expertise.</p> <p>Key Indicators</p> <ul style="list-style-type: none"> Student work is consistently improving. Instructional strategies and interventions are implemented with fidelity. 	

- The acting principal had only been in this building for several days and a new principal was slated to be announced the following day after the SRO site scheduled visit. The previous principal resigned shortly after scheduling the SRO visit.
- The school requires a highly visible strong turnaround leader to lead the charge for systematic change with a strong emphasis on teaching and learning.

- All focus groups reported that the lack of classroom textbooks was a major challenge. "Teachers spend an inordinate amount of time making copies," reported one parent.
- The community reported that they wanted more resources needed to make learning interesting and fun for students. The school currently lacks art, music, and physical education is provided on a limited basis.
- The community would like to see more adult role models for the students.
- Parents reported barriers in being able to support their children and they would like to see a "Parent University" developed to support parent engagement.
- The leadership reported that the constant change in superintendents and principals contributed to the lack of consistency and the lack of a district mission.
- The leadership reported that International Academy at Hull school is faced with declining student enrollment and their best students are leaving the district.
- The leadership reported that staff retention rates are high and the school uses long-term substitutes to fill vacancies. Additionally, school lay-offs due to budgetary concerns have contributed to the loss of teaching staff.
- The leadership reported that the school does not have enough teachers for each grade level.
- The teachers reported that they would like more adult assistance in the classrooms.
- The leadership reported that parents have used school of choice to leave the district due to safety concerns.

Key practices/strategies:

- The leadership reported that the school is using Engaged New York and views this as a step in the right direction.
- The leadership reported that community wide communication as a key strategy between teachers, parent, and school is needed but did not cite examples.

Turnaround Strategy Domain 1: Leadership, Shared Responsibility, and Professional Collaboration

The school has established a community of practice through leadership, shared responsibility, and professional collaboration.

Key Question: How, and to what extent, do you (and your leadership team) cultivate shared ownership, responsibility, and professional collaboration in the school?

Turnaround Strategy Components	Alignment with Best Practice
<p>Teaming, Shared Leadership and Responsibility, and Collaboration</p> <p>Distributed leadership structures and practices are apparent throughout the school building in the form of an active and well-represented Leadership Team and grade-level and vertical teams.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> • The school leadership team meets regularly and includes representation from all grades and student needs. • Grade-level and vertical teams meet regularly. • Teams exhibit a strong commitment to high expectations for all students and a willingness to work together to improve instruction. 	
<p>Using Teams, Shared Leadership, and a Collaborative and Trusting Environment to Accelerate Improvement</p> <p>Administrators and teachers (through teacher teams or involvement in the leadership team) are monitoring and assessing the implementation and impact of key improvement strategies, use of resources, classroom instructional practices, and non-academic supports on student achievement.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> • Adaptation: Leadership has the demonstrated ability to adapt, innovate and do whatever it takes to improve student achievement. • Instructional Observation: Instruction is formally and informally observed and meaningful feedback is provided. Teachers, as well as students, are held to high expectations. 	

- The leadership team meets monthly and they have identified two committees: Academic and Behavior.
- The Second Grade teachers collaborate informally but no information was provided on other grade levels.
- All teachers participate in formal grade level PLC meetings.
- The school is focusing on teacher needs by ensuring that every teacher has a mentor. Previously, new teachers to the district were not provided with a mentor.
- The school uses Instructional Coaches to model lessons and provide coaching for staff.

Turnaround Strategy Domain 2: Intentional Practices for Improving Instruction

The school uses an aligned system of common core curricula, assessments, and common instructional practices across the school and content areas, and employs intentional practices for improving teacher-specific and student-responsive instruction.

Key Question: What are the strategies and practices that you and your colleagues use to improve instruction? Specifically, how do you work to improve teachers' instruction?

Turnaround Strategy Components	Alignment with Best Practice
<p>Common core curriculum and aligned and rigorous instructional practices. Administrators and teachers develop and use vertically and horizontally aligned curricula and instructional strategies that includes common units, lessons, assessments, and instructional strategies and language within and across grades and content areas.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> Teachers' unit and lesson plans are similarly structured, incorporating best practices, directly linking lesson content with the grade-level standards and standards taught in prior and subsequent grades. A common set of instructional strategies, academic language, and other learning tools are evident in lessons and in practice, to enable students to access content. 	
<p>Defined expectations for high quality instructional practices The school has a clear instructional focus and shared expectations for instructional best practices that address students' instructional needs.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> Leaders and teachers understand the instructional focus and how the instructional focus informs (or is evident in) classroom practice. Teachers have received training and professional development on the instruction focus and related instructional strategies. 	
<p>Teacher support and feedback to improve instruction Teachers are actively supported to develop high quality lessons, deliver high quality lessons and instruction and to become experts in using and refining effective instructional strategies.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> The principal (or administrators or coaches) spend significant time in classrooms, observing teachers' instruction and providing teachers with constructive and useful feedback on instructional practices. Teachers (and teacher team) use a variety of standards-based assessments to assess the effectiveness of instructional strategies and modify instruction accordingly. 	

- The District has adopted Engaged New York as the new curriculum and implementation began January, 2016. Full implementation of the curriculum began September, 2016.

Turnaround Strategy Domain 3: Providing Student-Specific Supports and Instruction to All Students

The school is able to provide student-specific supports and interventions informed by data and the identification of student-specific needs

Key Question: How, and to what extent, does your school provide student-specific supports and interventions to students?

Turnaround Strategy Components	Alignment with Best Practice
<p>Tiered and Targeted Interventions for Students and Monitoring for Effectiveness The school has a system (structures, practices, resources) for providing targeted instructional interventions and supports to all students which also includes close monitoring of the impact of tiered interventions on students' progress.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> Students are provided with targeted, student-specific instruction and interventions in direct response to their academic areas of need, rather than placing entire groups of students in intervention groups. The impact of classroom-based and tiered interventions is frequently monitored (e.g., regularly, in 2, 4, or 6 week intervals and often by grade-level teams or by school support teams) and then refined in direct response to students' needs. 	
<p>Data Use and Data Informed Targeting of Interventions Administrators and teachers use a variety of ongoing assessments (formative, benchmark, and summative) to frequently and continually assess instructional effectiveness and to identify students' individual academic needs.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> A variety of valid and reliable assessments (standards-based and performance assessments) are used consistently, within and across grades and content area. Administrators and teachers are using assessment to identify the specific students needing additional support and the targeted areas of need for each specific student. 	

- The leadership reported that two intervention specialists were trained by Dr. Lanier from the ISD.
- The school has designated intervention rooms and study programs beginning this year for struggling students.
- The school also has portables which are used for smaller more intensive intervention settings and include: staff, intervention specialist and fewer students.
- The school appears to transport a large proportion of their students to and from school by bus.

Turnaround Strategy Domain 4: School Climate and Culture

The school has established a climate and culture that provides a safe, orderly and respectful environment for students and a collegial, collaborative, and professional culture among teachers that supports the school's focus on increasing student achievement.

Key Question: How does your school attend to students' social-emotional health and establish a safe, orderly, and respectful environment for students?

Turnaround Strategy Components	Alignment with Best Practice
<p>Safety and secure learning environment. The school has established and provides a safe and secure learning environment for students, staff and community members.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> • Student to student interaction and teacher to student interactions are respectful and considerate, as observed during the visit. 	
<p>Shared Behavioral Expectations that support student learning Administrators and teachers have and use a clearly established set of behavioral expectations and practices that supports students' learning.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> • Expectations of student behavior are written and clearly shared and understood throughout the school building. • Behavioral expectations are reinforced through consistently applied rewards and consequences (consistent among and across teachers and grades). 	
<p>Targeted and effective social-emotional supports The school has identified, established, and proactively provides effective social-emotional resources and supports for students in need of such supports and assistance.</p> <p>Key indicators:</p> <ul style="list-style-type: none"> • The school has identified a wide array of effective social-emotional responses and supports for students in need of such assistance and support. • Students that may need or benefit from social-emotional supports are identified and receive targeted social-emotional support. • Data on the effectiveness of social-emotional supports is collected and monitored. 	

- The District has supported all schools in addressing safety concerns by assigning several security guards to each school. The teachers were pleased to have security guards assigned to the school and requested that they not be removed.
- The leadership team is in the beginning phases of implementing PBIS. The school has held PBIS celebration meetings for one grade level and is anticipating adding another grade level as they learn the school expectations.
- The school conducts a behavior meeting and uses data from individual classrooms. The purpose of the behavior meeting is for staff to think of solutions. Data is collected, tracked and monitored using

Power Skill. Previously, the school used SWIS, a web-based information system to collect, summarize, and use student behavior data for decision making.

- The leadership reported that the school has identified two of the most cited behavioral referrals: Defiance and Disrespect. Grade bands were changed to help alleviate problem behaviors.
- A Community Health Needs Assessment brought more awareness to staff about the high rate of mental issues in the county. The school is partnering with a consultant from Chicago who specializes in helping students overcome adverse experiences. Staff is garnering more understanding in how childhood experiences hinder growth, social-emotional needs and anger in children.
- The behavioral interventionists have the opportunity to have social-emotional interviews with students. The primary purpose of these interviews is ensure that students remain in school and not be referred for an Out of School Suspension.
- The school also uses "The School within the School Model" for identified students requiring intensive support.

Turnaround Strategy Domain 5: District System to Support Accelerated Improvement and Turnaround

The district has developed systems for identifying schools that are not performing well, and strategies for monitoring and supporting school leadership and teachers.

Examples of district systems:

- Strategic placement and assignment of principals and teachers in high need schools, including the use of incentives to get the right leaders and teachers in high need schools.
- Provision of additional staffing and resource autonomy to leaders in high need schools
- Provision of additional supports (e.g., coaching supports, instructional resources) to high need schools.

Key Questions:

- How does the district monitor and/or support you in your efforts to improve instruction and raise student achievement?
- To what extent has the district provided you with additional autonomy to make changes to staff (e.g., to hire new teachers and/or quickly remove teachers not supportive of your work), to the school's schedule, and in your use of resources? How much autonomy do you have?

	Alignment with Best Practice
District Capacity - Core Functions The District has established and/or provides schools with base supports necessary for effective teaching and learning (Core curriculum and professional development, assessments, data systems, instructional materials, human capital).	
District capacity - Monitor and support The district has established and communicated a district-wide improvement strategy, including a vision and specific goals for improvement. The improvement strategy includes specific strategies for monitoring and supporting schools (leaders, teachers, and students).	
District Capacity – Conditions and Autonomy The district provides schools with sufficient autonomy and authority to implement turnaround actions, while holding schools accountable for results.	

- According to the districts, they are working to hire more specials teachers for each school.
- According to the district, the school has the resources and materials needed to implement EngageNY.
- According to the district, the school has been provided professional development and intensive curriculum training for teachers.
- According to the district, they have placed security guards in all schools to address safety concerns at the beginning of the 2016-2017 school year.
- Of the three schools visited within this district, this school appears to have a much larger security staff.

Conditions and Autonomy:

- According to the acting principal, the district provides the school with some autonomy around the implementation of turnaround actions.

Unreasonable Hardship Review Part 2b: Operational On-Site Review (Facility Conditions Index)

The SRO partnered with DTMB's Facilities & Business Services Administration Office (SFA) to determine a facility conditions index (FCI) for **International Academy at Hull**. The FCI measures maintenance and repair costs against current replacement cost of the building. The lower the number, the less cost effective it is for the district to keep the building open.

All inspections were designed to be non-intrusive and the results were based on observations and assumptions given the factual knowledge provided.

FCI SCORE: 66.4

A copy of DTMB's FCI report is attached to this report as Appendix B.

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Unreasonable Hardship Review Part 3: Access and Availability

Whether statutorily required under MCL 380.391(3), MCL 380.507(6), MCL 380.528(6), or MCL 380.561(6), or optionally adopted under MCL 380.1280c, the SRO is committed to completing an analysis of whether the proposed closure will result in unreasonable hardship to pupils attending **International Academy at Hull**. The SRO will consider other public school options available to students in the grade levels offered and geographic area served by **International Academy at Hull** to determine if the closure would result in an unreasonable hardship for the impacted students. The SRO is committed to ensuring that any closure does not necessitate the enrollment of a displaced student in another failing school. When evaluating the sufficiency of other public school options for affected pupils and unreasonable hardship, the SRO evaluates a variety of factors that can generally be organized into three different categories. These categories include, but are not limited to:

- **Geography:** Are there schools within a reasonable number of miles from the school identified that serve the same grade levels as the identified school?
- **Performance:** Are there schools that were identified during the geographic evaluation that also have an acceptable Top-to-Bottom ranking?
- **Access:** Do the students that would be displaced by the NLA Action have reasonable access to the schools identified during both the geographic and performance evaluations?

The results of the SRO's analysis are included in the below table. The number of schools that meet the parameters defined in the left most two columns is included in column #3 and the estimated capacity of the qualifying schools is included in column #4. The right-most two columns define the # of qualifying schools that would not require students to utilize the schools-of-choice legislation (MCL 388.1705/MCL 388.1705c) to gain access and the estimated capacity of those qualifying schools that would not require utilization of the schools-of-choice legislation.

Distance Parameter (Maximum in miles)	TTB Ranking Parameter (Minimum)	# of Qualifying School-of-Choice Schools	Estimated Capacity of Qualifying School-of-Choice Schools	# of Qualifying Local Access Schools	Estimated Capacity of Qualifying Local Access Schools	Total # of Qualifying Schools that Displaced Students Could Access	Total Estimated Capacity of Qualifying Schools that Displaced Students Could Access
5	25	1	3	1	0	2	3
10	25	8	34	1	0	9	34
15	25	14	62	1	0	15	62
20	25	17	84	1	0	18	84
25	25	24	138	1	0	25	138
30	25	31	186	1	0	32	186

Unreasonable Hardship Data Key Takeaways

- There is 1 accessible school of choice that is qualifying and that are located nearby, within 5 miles. It could accommodate up to 3 students.
- There is only 1 accessible local access school within a 5-mile radius and 1 within a 10 mile radius. They could not accommodate any students.
- The total number of schools within a 10 mile radius that are accessible is 9 schools, and could accommodate up to 34 students.

Unreasonable Hardship Review Part 4: Final Determination

The SRO's Final Unreasonable Hardship Determination is based on a comprehensive review of all available data, the results from both operational and academic on-site review visits and an examination the other public school options that are available to the students that would be impacted by the closure of **International Academy at Hull**. All of the information produced and insights gained from the Unreasonable Hardship Review Process that have been detailed in this report, were considered when answering the three key questions that comprise the SRO's Final Unreasonable Hardship Determination.

Question 1: Are the academic and operational and academic realities of the identified school reflective of a school poised for rapid turnaround?

	The academic and operational realities of the identified school reflective of a school poised for rapid turnaround.
	The academic but not the operational realities of the identified school reflective of a school poised for rapid turnaround
	The operational but not the academic realities of the identified school reflective of a school poised for rapid turnaround
	Neither the academic nor the operational realities of the identified school reflective of a school poised for rapid turnaround

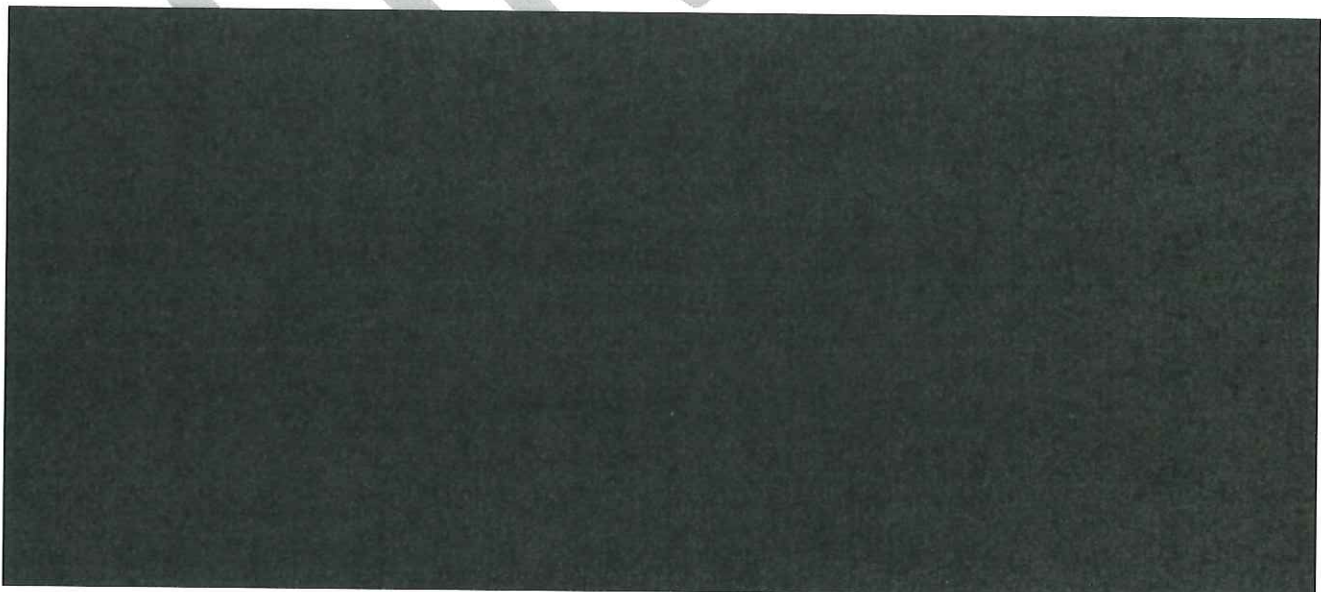
Question 2: Are there are sufficient other public school options reasonably available to these pupils?

	There are sufficient other public school options reasonably available to these pupils?
	There are insufficient other public school options reasonably available to these pupils?

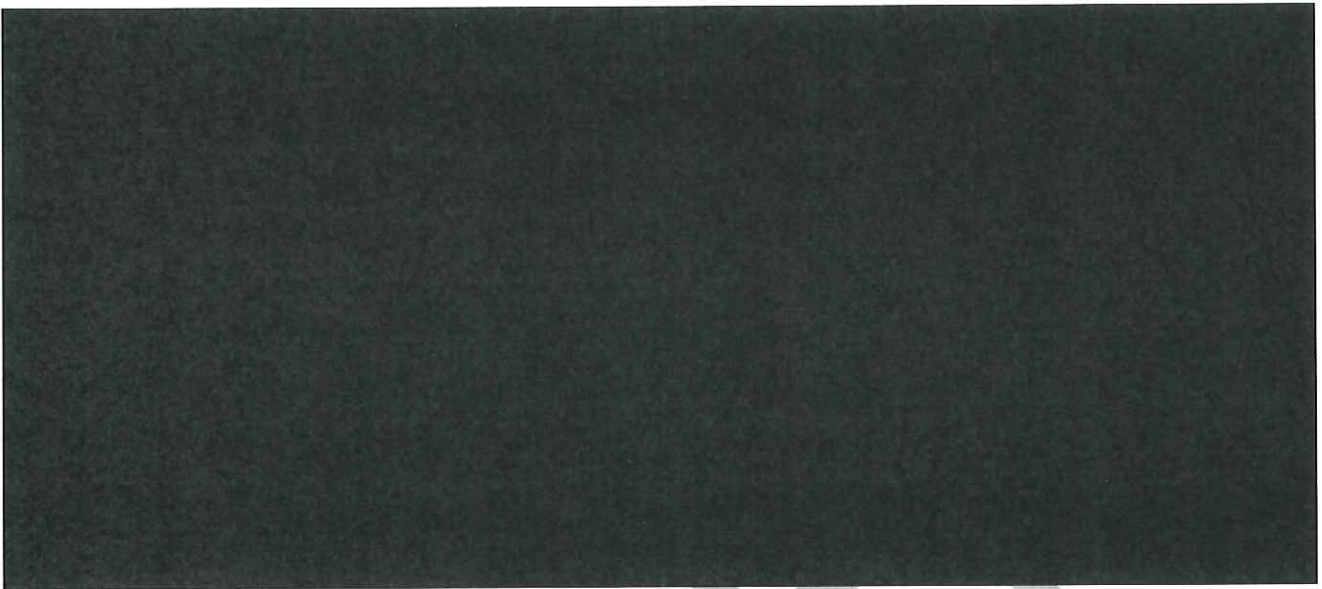
Question 3: Would the proposed NLA action result in an unreasonable hardship to the displaced pupils?

	The proposed NLA action would not result in an unreasonable hardship to the displaced pupils
	The proposed NLA action would result in an unreasonable hardship to the displaced pupils

Determination:



Next Steps:



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APPENDIX A: SRO Unreasonable Hardship Data Request Packet

The SRO is committed to ensuring that the Unreasonable Hardship Determination required under MCL 380.391(3), MCL 380.507(6), MCL 380.528(6), MCL 380.561(6), or optionally adopted under MCL 380.1280c is as informed as possible. Therefore, the SRO is requested that the following information be provided in an editable format (e.g., .doc, .docx, .xls, .xlsx, etc.) by Tuesday, February 1, 2017. Where possible, the information provided will be verified against previously reported and publically available data.

Data review components:

- Academic
- Climate and Culture
- Professional
- Operational

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Academic Data**Top-to-Bottom Rankings by Year**

2012	2013	2014	2015	2016
10	1	4	1	0

Student Proficiency – Mathematics

Student Group	% Proficient or Above 2013-2014	% Proficient or Above 2014-2015	% Proficient or Above 2015-2016
All Students			
Native American			
Asian			
African-American			
Hispanic	13.04		6.9
Native Hawaiian, Pacific Islander			
White			
Multi-Race, Non-Hispanic			
Economically Disadvantaged	5.11		
Students with Disabilities (IEP & 504)	9.09	18.18	13.33
English Language Learners	5.88		6.45

Student Proficiency – Reading/ELA

Student Group	% Proficient or Above 2013-2014	% Proficient or Above 2014-2015	% Proficient or Above 2015-2016
All Students	23.81	8.7	7.28
Native American			
Asian			
African-American	21.07	7.14	5.48
Hispanic	39.13	19.35	20
Native Hawaiian, Pacific Islander			
White			
Multi-Race, Non-Hispanic			
Economically Disadvantaged	23.12	8.76	7.11
Students with Disabilities (IEP & 504)	10.61	16	8.93
English Language Learners	29.41	16.13	18.75

Student Proficiency – Science

Student Group	% Proficient or Above 2013-2014	% Proficient or Above 2014-2015	% Proficient or Above 2015-2016
All Students			
Native American			
Asian			
African-American			
Hispanic	7.69	7.69	8.33
Native Hawaiian, Pacific Islander			
White			
Multi-Race, Non-Hispanic			
Economically Disadvantaged			
Students with Disabilities (IEP & 504)	10	15.38	12.5
English Language Learners		7.69	7.69

Student Proficiency – Social Studies

Student Group	% Proficient or Above 2013-2014	% Proficient or Above 2014-2015	% Proficient or Above 2015-2016
All Students			5.13
Native American			
Asian			
African-American			
Hispanic			
Native Hawaiian, Pacific Islander			
White			
Multi-Race, Non-Hispanic			
Economically Disadvantaged			
Students with Disabilities (IEP & 504)		10.53	16.67
English Language Learners			

Climate and Culture Data**Enrollment by Subgroup²**

Race	2013-2014	2014-2015	2015-2016
All Students	517	471	386
Male	296	274	230
Female	221	197	156
Native American			
Asian			
African-American	385	382	317
Hispanic	104	70	49
Native Hawaiian, Pacific Islander			
White	17	14	12
Multi-Race, Non-Hispanic			
Economically Disadvantaged	464	410	338
Students with Disabilities (IEP & 504)	86	85	88
English Language Learners	85		48

Enrollment by Grade

	K	1	2	3	4	5	6	7	8	9	10	11	12	Total
2013-2014	0	72	70	81	89	68	42	45	50	0	0	0	0	517
2014-2015	0	56	69	64	67	77	57	38	43	0	0	0	0	471
2015-2016	0	38	50	48	43	54	49	68	36	0	0	0	0	386

Special Population Percentages

	2013-2014 (%)	2014-2015 (%)	2015-2016 (%)
English Language Learner	16.4%		12.4%
Students with Disabilities (IEP & 504)	16.6%	18.0%	22.8%
Economically Disadvantaged	89.7%	87.0%	87.6%

Attendance

	2013-2014	2014-2015	2015-2016
Attendance Rate (%)	91.1%	89.6%	92.4%
Percent Chronically Absent	49.8%	52.3%	44.3%
Chronically Absent Student Count	270	251	176

² Enrollment by student(s) does not necessarily indicate that the student(s) will take state assessments.

Professional Data**Teacher Evaluations**

	# of Teachers 2013-2014	% of Teachers 2013-2014	# of Teachers 2014-2015	% of Teachers 2014-2015	# of Teachers 2015-2016	% of Teachers 2015-2016
Highly Effective	4	9.8%	4	16.0%	3	13.0%
Effective	33	80.5%	19	76.0%	14	60.9%
Marginally Effective	1	2.4%	1	4.0%	5	21.7%
Ineffective	3	7.3%	1	4.0%	1	4.4%

Total Teachers	41
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23
